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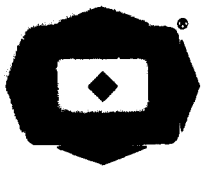

McCaw Cellular Communications, Inc.

Cathleen A. Massey
Senior Regulatory Counsel

February 27, 1995

William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Mail Stop Code 1170
Washington, D.C. 20544

RE: Ex Parte Presentation
Equal Access And Interconnection Obligations Pertaining to
Commercial Mobile Radio Services, CC Docket No. 94-54, RM-8012

Dear Mr. Caton:

Pursuant to the requirements of Sections 1.1200 et seq. of the Commission's Rules, you are hereby notified that on behalf of McCaw Cellular Communications, Inc., Gerry Salemme, AT&T Corp. Vice President - Federal Relations, Howard Symons of Mintz, Levin, Glovsky, Ferris & Popeo and me met today with Mary McManus, Legal Advisor to Commissioner Ness. During the course of the meeting, the representatives of McCaw reiterated the view, expressed in AT&T's comments and reply comments in the above-referenced docket, that the imposition of interconnection requirements on CMRS providers is unnecessary and would be counterproductive. The attached handout was used during the course of the discussion

Should there be any questions regarding this matter, please contact me.

Sincerely,

Cathleen A. Massey

cc: Mary McManus

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List A B C D E

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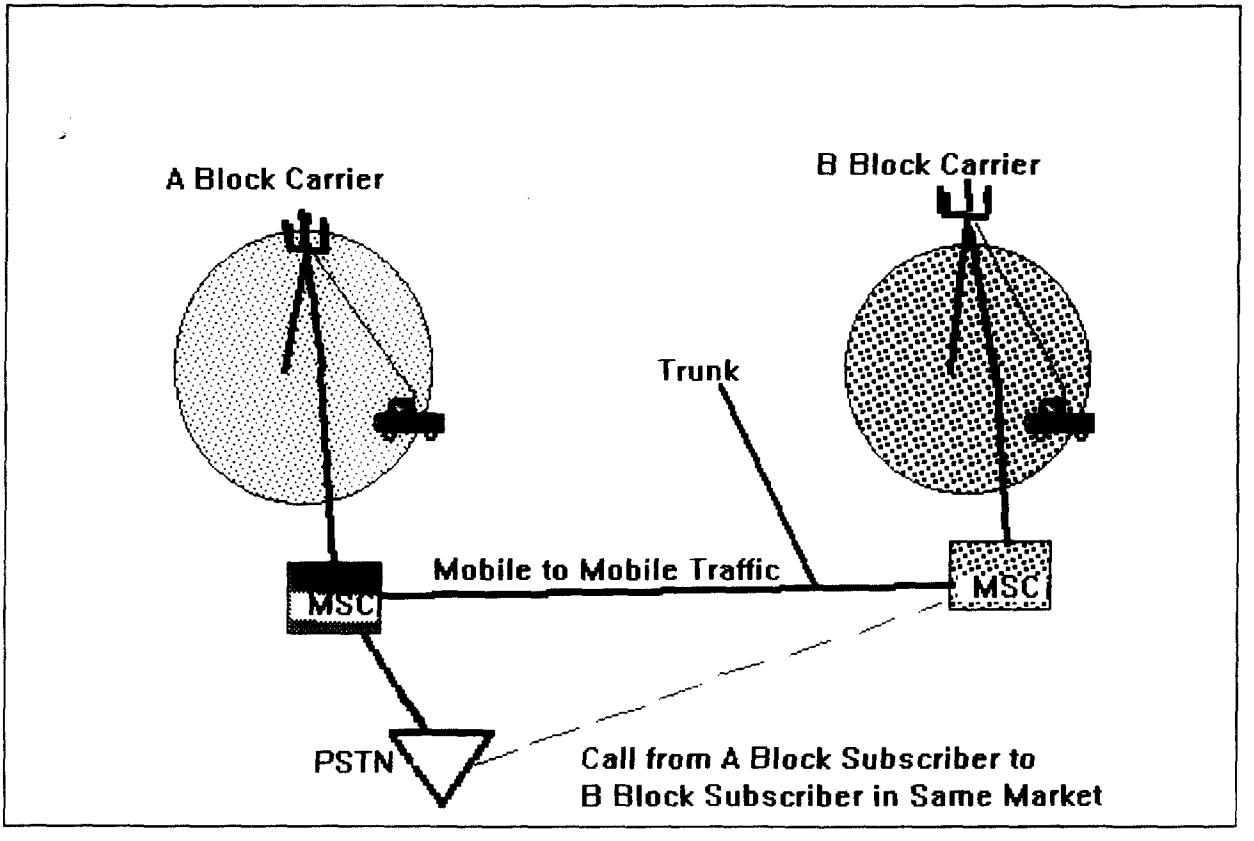
DIRECT CONNECTION: Used for the termination of traffic between two carriers operating in the same market. For example, the mobile-to-mobile traffic between two cellular carriers in the same market may reach a volume sufficient to justify a direct connection between the two carriers. Today, carriers negotiate direct connection arrangements when it is technically and economically efficient for them to do so.

Requires compatible switch equipment and the resolution of the following factors:

* traffic engineering (how many circuits? Is it justified?)
* type of connection (one-way, two-way)
* signalling format (SS7/ISUP, MF)
* signalling information to be exchanged (Feature Group B, D)
* simultaneous seizure (master/slave)
* physical design (copper, fiber, ingress, egress, etc.)
* administration (who orders? who installs?)
* cost and cost sharing (who pays what to whom)
* operations (who maintains? who responds to outages?)
* alternate routing plans

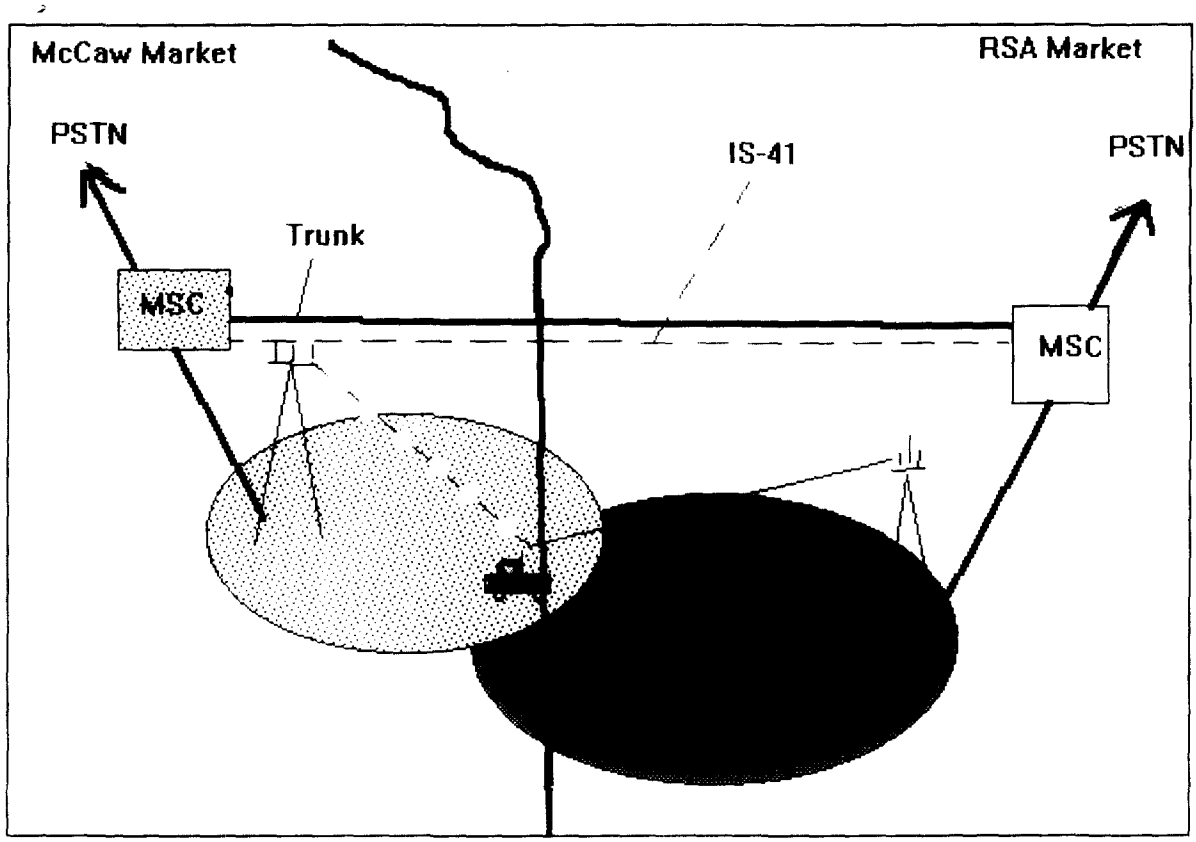


INTERSYSTEM HANDOFF: Used to hand a call from one carrier's cell site to another carrier's cell site as the subscriber moves across a market boundary. For example, cellular carriers voluntarily have established intersystem handoff agreements with each other to allow subscribers to move between markets without having calls interrupted. Today, carriers routinely negotiate these arrangements although they are not required to do so by the FCC.

Requires compatible switch equipment and the resolution of the following factors:

* administration of macro system upgrades that may require similar upgrades to neighboring switch
* traffic engineering (how many circuits? Is it justified?)
* signalling format (SS7/ISUP, MF)
* signalling information to be exchanged (Feature Group B, D)
* simultaneous seizure (master/slave)
* physical design (copper, fiber, ingress, egress, etc.)
* administration (who orders? who installs?)
* cost and cost sharing (who pays what to whom)
* operations (who maintains? who responds to outages?)
* alternate routing plans

Also requires compatible handset equipment. For example, for a PCS subscriber to be handed off to a cellular carrier, the PCS subscriber's handset has to be able to hop between frequency bands and employ compatible technology (analog, CDMA, TDMA).



<u>RESELLER SWITCH</u>: Would require carriers to identify originating caller as a reseller customer and rout that traffic to a reseller switch. Alternatively, could require assignment of numbers and routing of incoming traffic from PSTN to the reseller switch.

Requires compatible network equipment and resolution of the following factors:

* separate reseller interconnection arrangement with the LEC
* administration of macro system upgrades that may require similar upgrades to reseller switch
* traffic engineering (how many circuits? Is it justified?)
* type of connection
* physical design (copper, fiber, ingress, egress, etc.)
* administration (who orders? who installs?)
* cost and cost sharing (who pays what to whom)
* operations (who maintains? who responds to outages?)
* alternate routing plans
* number administration